

LAW OFFICES OF MIRIAM HISER

Miriam Hiser (SBN 129824)
550 Montgomery, Suite 650
San Francisco, CA 94111
Tel: (415) 345-9234
E-mail: mhiser@hiserlaw.com

LOWENSTEIN SANDLER LLP

Bruce S. Nathan, Esq. (NY 1710896)
Eric S. Chafetz, Esq. (NY 4322871)
1251 Avenue of the Americas, 17th Floor
New York, New York 10020
Tel: (212) 262-6700
E-mail: bnathan@lowenstein.com
echafetz@lowenstein.com

Counsel to Imerys Filtration Minerals, Inc. f/k/a Imerys Minerals California, Inc.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11
(Jointly Administered)

**WITHDRAWAL OF LIMITED OBJECTION
AND RESERVATION OF RIGHTS OF
IMERYS FILTRATION MINERALS, INC.
F/K/A IMERYS MINERALS CALIFORNIA,
INC. TO (I) NOTICE OF FILING OF PLAN
SUPPLEMENT IN CONNECTION WITH
DEBTORS' AND SHAREHOLDER
PROONENTS' JOINT CHAPTER 11 PLAN
OF REORGANIZATION DATED MARCH 16,
2020 AND (II) ASSUMPTION OF
PURPORTED IMERYS AGREEMENT AND
CURE CLAIM**

Imerys Filtration Minerals, Inc. f/k/a Imerys Mineral California, Inc. ("Imerys") hereby
withdraws its limited objection and reservation of rights (the "Limited Objection") to the *Notice
of Filing of Plan Supplement in Connection with Debtors' And Shareholder Proponents' Joint*

28565/3

09/09/2020 206425017.1

1 *Chapter 11 Plan of Reorganization Dated March 16, 2020* [Dkt. No. 7037](the “Plan
2 Supplement”) filed herein on May 15, 2020 as Docket Number 7297.

3
4 Dated: September 9, 2020.

LAW OFFICES OF MIRIAM HISER

5 /s/ Miriam Hiser
6 Miriam Hiser, Esq. (SBN 129824)
7 550 Montgomery, Suite 650
8 San Francisco, CA 94111
9 Tel: (415) 345-9234
10 E-mail: mhiser@hiserlaw.com

11 -and-

LOWENSTEIN SANDLER LLP

12 Bruce S. Nathan, Esq.(NY 1710896)
13 Eric S. Chafetz, Esq. (NY 4322871)
14 1251 Avenue of the Americas
15 New York, New York, 10020
16 Tel: (212) 262-6700
17 Fax: (212) 262-7402
18 E-mail: bnathan@lowenstein.com
19 echafetz@lowenstein.com

20 *Counsel to Imerys Filtration Minerals, Inc.*
21 *F/K/A Imerys Mineral California, Inc.*
22
23
24
25